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Attorney for Defendant
CARLOS IVAN VARGAS, SR.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR-09-00888 JF
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
vs.)	<u>CONTINUING STATUS CONFERENCE</u>
CARLOS IVAN VARGAS, SR., et al.,)	
Defendants.)	

Plaintiff UNITED STATES OF AMERICA, through its counsel of record, Assistant United States Attorney ("AUSA") Jeffrey B. Schenk, and defendants CARLOS IVAN VARGAS, SR., JOHN MASAKAZU TASHIRO and DANIEL JOSE DOMINGUEZ, through their respective counsel of record, Peter Goodman, Assistant Federal Defender ("AFD") Varell Fuller and John J. Jordan, hereby stipulate and agree as follows:

1. A Status Conference in this matter is presently scheduled for Thursday, April 8, 2010, at 9:00 a.m.

2. A forensic accounting expert is assisting counsel for defendant VARGAS in reviewing the voluminous business records provided in discovery that the government alleges detail the mail and wire fraud conspiracies charged against the defendants in the indictment. The expert is also employed as a staff accountant by a private accounting firm that is preparing tax returns for its clients which are due April 15, 2010. Counsel for

1 defendant VARGAS is informed and believes that owing to that deadline, the forensic
2 accounting expert assisting him in reviewing the discovery will not be able to complete
3 his review for approximately 30 days.

4 3. In order to allow sufficient time for that review to be completed, counsel
5 for defendant VARGAS has requested and the other parties have agreed that the Status
6 Conference in this matter presently set for April 8, 2010, at 9:00 a.m. be continued to
7 May 6, 2010, at 9:00 a.m.

8 SO STIPULATED

9 DATED: April 5, 2010

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12 /s/
JEFFREY P. SCHENK
Assistant United States Attorney

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14 SO STIPULATED

15 DATED: April 5, 2010

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17 /s/
PETER GOODMAN
Attorney for Defendant
CARLOS IVAN VARGAS, SR.

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20 SO STIPULATED

21 DATED: April 5, 2010

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23 /s/
VARELL FULLER
Assistant Federal Defender
Attorney for Defendant
JOHN MASAKAZU TASHIRO

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1 SO STIPULATED

2 DATED: April 5, 2010

4 /s/

JOHN J. JORDAN
Attorney for Defendant
DANIEL JOSE DOMINGUEZ

7 GOOD CAUSE APPEARING from the parties' Stipulation Continuing Status
8 Conference, IT IS HEREBY ORDERED that the Status Conference in this matter, which
9 is scheduled for April 8, 2010, at 9:00 a.m., be continued to May 6, 2010, at 9:00
10 a.m.

11 DATED: 4/5/10



JEREMY D. FOGEL
United States District Court Judge